

REMARKS

Claims 1 and 3 are all the claims pending in the application. By this amendment, the recitations of dependent claim 2 have been added to independent claim 1, and dependent claim 2 has been canceled.

Claim 1 is the only independent claim.

Claim Rejection Under 35 U.S.C. § 112

Claims 1-3 are rejected under 35 U.S.C. § 112, first paragraph, as allegedly failing to comply with the written description requirement.

In the previous response, Applicant amended claim 1 to recite that “the one side [is] provided opposite to the other side with respect to a radial direction of the drum.” However, the Examiner now asserts that this added recitation is not supported by the original specification.

In response, Applicant has amended independent claim 1 to recite that the reinforcing material is guided in *opposite orientations* by the first and second conveying paths.¹ Specifically, claim 1 recites that the first conveying path guides the reinforcing material toward the drum at a *first orientation*, and that the second conveying path guides the reinforcing material toward the drum at a *second orientation that intersects the first orientation*.

In view of this amendment, Applicant respectfully requests the Examiner to withdraw this rejection under 35 U.S.C. § 112.

¹ See original specification at page 12, line 1-2 and FIGS. 4C and 4E. Such a device would allow a single device to be used for forming plural belt layers having cords that extend in intersecting directions

Claim Rejection Under 35 U.S.C. § 103

Claims 1-3 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Suda et al. (US 2003/0051794) taken alone, or further in view of Hitotsuyanagi et al. (US 2002/0046796).

Applicant has amended independent claim 1 to include all of the recitations of dependent claim 2. Applicant respectfully requests the Examiner to withdraw the rejection of independent claim 1 at least because there is no reasonable combination of Suda and Hitotsuyanagi that would meet every recitation of the claim. For example, there is no combination of Suda and Hitotsuyanagi that would reasonably meet the claimed device including a first conveying path guiding the reinforcing material toward the drum *at a first orientation*; and a second conveying path guiding the reinforcing material toward the drum *at a second orientation that intersects the first orientation*, in which a reinforcing material exit of the first conveying path is inclined with respect to the axial direction of the drum, and a reinforcing material exit of the second conveying path, *is inclined in a direction opposite the reinforcing material exit of the first conveying path*. By this configuration, the device of claim 1 has the advantageous effect in that *it does not require rotation of the conveying path* to provide plural belt layers having cords that extend in intersecting directions, in contrast to devices in the prior art.²

Neither Suda nor Hitotsuyanagi discloses the recited configuration. For example, although Suda at FIGS. 25-28 may disclose strips 202 provided at different orientations (FIG. 25 v. FIG. 27), these strips 202 are not provided at opposite *inclinations*.

² See, for example, the exemplary embodiment at FIG. 3 in which the reinforcing material 12A is guided in opposing inclinations, in addition to the different orientations.

Thus, Applicant respectfully requests the Examiner to withdraw the rejection of independent claim 1.

In addition, Applicant respectfully requests the Examiner to withdraw the rejection of dependent claim 3 at least because of its dependency from claim 1.

Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

/John M. Bird/

John M. Bird
Registration No. 46,027

SUGHRUE MION, PLLC
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

WASHINGTON OFFICE

23373

CUSTOMER NUMBER

Date: July 7, 2008